



City of Oshkosh
215 Church Avenue, PO Box 1130
Oshkosh, WI 54901
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<http://www.ci.oshkosh.wi.us>

+Mark A. Rohloff
City Manager

December 18, 2015

Mr. Matthew Didier
Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
Phone 312-353-2112

RE: EPA Community Wide Assessment Grant Application for Hazardous
and Petroleum Substances

Dear Mr. Didier:

The City of Oshkosh (City) is pleased to submit the attached application to the Environmental Protection Agency (EPA) for a \$200,000 Community-Wide Hazardous Substance Assessment Grant and a \$200,000 Community-Wide Petroleum Substance Assessment Grant. The community-wide proposal is being submitted to address multiple sites within the community, including projects along the Fox River, in the heart of downtown Oshkosh, in a historical, industrial corridor.

Located in the east-central portion of Winnebago County and is bisected by the Fox River at its confluence with Lake Winnebago. This strategic location along the waterways served an important role in the history and development of the City, particularly with respect to its industrial base along the riverfront. Many of the businesses that supported the lumber industry slowly went out of business throughout the mid to late 1900s. Recently, several of the remaining companies from that era closed down or have downsized with the loss of several hundred jobs and left behind many blighted and underutilized industrial properties. Many of the properties are contaminated with petroleum and other hazardous substances leaving multiple brownfield sites that need to be addressed in Oshkosh. Many of these sites are located in the central parts of Oshkosh where a disproportionate population of minorities and low income residents live. The support from the EPA Brownfield Assessment Grants is vital to protecting our citizens and tackling these complex brownfield sites.

In early 2000, the City developed the Oshkosh Comprehensive Plan and the Oshkosh Downtown Design and Development Plan to address many of the legacy issues resulting from its industrial past. Subsequently, the City developed a Fox River Corridor Riverwalk Plan and Design Guidelines to further focus revitalization of the Fox River riverfront and central Oshkosh Brownfield areas. Many of the goals outlined in Oshkosh's plans and guidelines are similar to the 2009 five EPA Livability Principles. Receipt of the EPA Brownfield Assessment Grant will continue to assist the city in achieving those goals outlined in the above mentioned Plans and Principles.

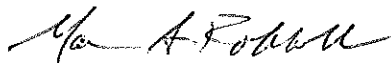
- a) Applicant Identification:
City of Oshkosh, 215 Church Avenue, P.O. Box 1130, Oshkosh, Wisconsin 54901
- b) City of Oshkosh DUNS Number - 048029839
- c) Funding Requested:
 - i. Grant type: Assessment
 - ii. Federal Funds Requested: \$400,000 ; no waiver for site specific proposal is being requested
 - iii. Contamination: \$200,000 Hazardous Substances and \$200,000 Petroleum
 - iv. Community-wide
- d) Location: City of Oshkosh, Winnebago County, Wisconsin
- e) No site specific proposal requested
- f) Contacts:

Project Director: Darlene Brandt Grants Coordinator City of Oshkosh Community Development 215 Church Ave., P.O. Box 1130 Oshkosh, Wisconsin 54901 PH: 920.236.50529 Fax: 920.236.5053 Email: dbrandt@ci.oshkosh.wi.us	Chief Executive: Mark A. Rohloff City Manager City of Oshkosh 215 Church Ave., P.O. Box 1130 Oshkosh, Wisconsin 54901 PH: 920.236.5002 Fax: 920.236.5039 Email: mrohloff@ci.oshkosh.wi.us
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- g) Date Submitted: December 18, 2015
- h) Project Period: September 2016 through September 2019
- i) Population: 66,325, U.S. Census-2012
- j) See attached "Regional Priorities Form/Other Factors" Checklist

The City of Oshkosh is experienced in Brownfield Redevelopment and have an established team of technical and economic development professionals including community partners capable of implementing this grant fully and effectively. We look forward to continuing our success of Brownfields redevelopment in which the EPA has been a valuable partner.

If you have any questions concerning this grant application, please contact Grants Coordinator Darlene Brandt at (920) 236.5029 or by email at dbrandt@ci.oshkosh.wi.us.

Very truly yours,



MARK A. ROHLOFF
City Manager

Appendix 3
Regional Priorities Form/Other Factors Checklist

Name of Applicant: City of Oshkosh

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.E, please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Region 5: Coordinated Public Funding for Brownfields

Page Number(s): _____

Assessment Other Factors Checklist

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Targeted brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	

<p>Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.</p>	
<p>Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.</p>	
<p>Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.</p>	

NARRATIVE PROPOSAL
CITY OF OSHKOSH APPLICATION FOR EPA COMMUNITY-WIDE BROWNFIELDS ASSESSMENT
GRANTS: HAZARDOUS SUBSTANCES AND PETROLEUM – December 18, 2015

Section V.B.

Ranking Criteria for Assessment Grants

1. Community Need

a. Targeted Community and Brownfields

i) Target Community Description: The City of Oshkosh (City), located in east central Wisconsin adjacent to where the Fox River joins Lake Winnebago has a long history of manufacturing. The City of Oshkosh was known as the sawdust city due to its long industrial history centered on logging and wood product manufacturing dating back to the late 1800's. A large industrial base was soon established to support the lumber industry, which included foundries, manufacturing of logging tools, finished wood products, and railroad and river boat transportation. By the 1960's, the logging industry came to halt and so did Oshkosh's economic boom. Many of the properties left behind from the demise of the logging industry continue to be blighted. Many of them are contaminated with petroleum and other hazardous substances.

Not only is the City dealing with its past industrial heritage the City's current manufacturing sector has drastically diminished. The recent loss of several hundred manufacturing jobs associated with the closing of Morgan Door Company and Buckstaff, a manufacturer of wood furniture, was a significant loss for the community. In addition, the recent economic recession has resulted in the closing or work force layoffs of several important employers, which included the Sears Holding Corporation, Hartwig Transit, Inc., Oshkosh B'Gosh Inc., Marvel Mfg. Company Inc., GE Oil and Gas Operations, Buckstaff, Hoffmasters, Oshkosh School district, and Bemis Tape Plant. In September 2011, the United States Postal Service (USPS) closed the Oshkosh Processing and Distribution Center with another loss or relocation of 149 employees and an estimated annual loss of \$31,000,000 in generated revenue. The closing or work force layoffs of these businesses resulted in the loss of an approximate 2,302 additional jobs in the last three years. In September 2012, Oshkosh Corporation (manufacturer of vehicles) announced a layoff of 700 employees with another 900 positions lost in the summer of 2013. An additional 1,000 layoffs also occurred in 2014. Due to the recent Oshkosh Corporation layoffs, a recent study by Economic Modeling Specialists (EMS) projected a total loss of 1,437 indirect community jobs in Oshkosh with a loss in earnings of \$112.9 million dollars.

The targeted community for this redevelopment project area is not only downtown Oshkosh and nearby residential and non-residential land uses (typically former industrial properties), but also the community as a whole. The Assessment Grants will focus where the majority of Brownfield properties are located in the Fox River Corridor Redevelopment Areas as described in Section 2.a., which in general includes Census Tract #5 on the north side of the Fox River and Census Tract #12 and #15 on the south side of the Fox River. Currently, this area has a high rental population, lower incomes, health concerns, and suffers from blight, high vacancy, crime, brownfield sites, distressed properties and vacant lots. The former manufacturing operations and mills are located along the river banks, often accompanied by large amounts of fill material that allowed these structures to be constructed in the floodplain. Located in the heart of the City, the Fox River Corridor has the longest history but the brightest future.

ii) Demographic Information

	Redevelopment Area Census Tract #5	Redevelopment Area Census Tract #12	Redevelopment Area Census Tract #15	Oshkosh	Wisconsin	National
Population	6,773	2,101	3,329	66,653	5,706,871	311,536,594
Unemployment Rate	7.9%	8.6%	8.8%	7.2%	7.8%	5.3%
Poverty Rate	41.1%	15.5%	18.6%	19.2%	13.0%	11.3%
Percent Minority	7.9%	14.6%	11.5%	8.5%	13.8%	36.7%
Medium Household Income	\$27,258	\$46,193	\$40,789	\$42,676	\$52,627	\$53,046

2013 US Census Quick Facts Database

The Fox River Corridor Redevelopment Areas (Census Tracts #5, #12, and #15) have been designated by the US Department of Housing and Urban Development as Low to Moderate Income (LMI) census tracts. Demographic data shows that these three areas are challenged by various economic factors. Based on 2013 US Census data these areas have 15.5% – 41.1% of families below the poverty rate, which is above the US average of 11.3%. In addition, the average median household income for the three Census Tracts is \$38,080 (US Census), which is lower than the US median household income of \$53,040. Redevelopment and blight elimination is an important part of reversing those difficult statistics.

iii) Description of Brownfields: Previous EPA Assessment Brownfields Grants were used to inventory over two hundred different parcels in both these areas of which 75 were considered Brownfield sites. Because of the City of Oshkosh's industrial past, many of these Brownfields are former heavy manufacturing facilities that used a broad array of hazardous chemicals. Specific example is the former Morgan Doors and Buckstaff manufacturing facilities. **The Morgan Door site** is comprised of 25 acres and was recently purchased. The new owners have demolished approximately 150,000 square feet of buildings dating back to the late 1800's, and some of the site is known to be a former landfill. **The Buckstaff site** is comprised of 14 acres and is occupied by various buildings in very poor condition. Contamination at the sites may include solvents, metals, asbestos, petroleum, and chlorophenolic chemicals used in the treatment of timber and lumber.

The South Shore Redevelopment area is comprised of two different Census Tracts #12 and #15 and is generally a low to middle working class neighborhood with various manufacturing complexes (foundries and machine shops) mixed with commercial and residential. Contamination at the sites may include solvents, metals, asbestos, lead paint, and petroleum.

Pioneer Island/Hotel site is one of the prime real estate locations in Oshkosh. Located where the Fox River empties into Lake Winnebago this former railroad marshaling yard was converted into a marina and a hotel in the late 1960s. In the mid-2000, the hotel went out of business and has since sat vacant and blighted. The marina has become silted in from run off from adjoining industrial sites and has become limited in use. While a prime development location, the site has been undeveloped due to the concerns of past contamination from the former railroad yard and impacts within the sediments at the marina.

Once a booming furniture maker, **Buckstaff** went out of business four years ago and the building has since sat vacant. The 14 acre site has multiple buildings that are rapidly deteriorating and have become a risk to the community. In addition, the former Buckstaff Property is located on a stretch of prominent property that is located on a gateway into the City via State Highway 45 and just six blocks south of the Fox River.

The Marion Road Redevelopment Area has been an ongoing project for the City and the City has made significant headway with redeveloping this area, which is located in Census Tract #5. Several of the larger parcels have been assessed through previous EPA Assessment Grants; however, several former industrial sites still need assessment and remedial planning. Vacant impacted lots and blighted buildings sit in the midst of a growing residential and mixed use redevelopment.

Based on review of the Wisconsin Department of Natural Resources (WDNR), Bureau of Remediation and Redevelopment Tracking System (BRRTS) online database, and Oshkosh's Brownfields GIS database, 390 leaking underground storage tank (LUST) sites, environmental repair program (ERP) sites, and 75 Brownfield sites have been identified in the City of Oshkosh. The City has identified the following Priority Brownfield Sites located in Census Tracts #5, #12, and #15 (see table below).

Priority Site	Contaminants*	Health Effects**	Size*** (Acres)
Morgan Door – Census Tract 12	Solvents, metals, asbestos, polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs)	Carcinogens, developmental, neurological, renal, and reproductive.	25
South Shore Redevelopment Area – Census Tract 12 and 15	Solvents, metals, asbestos, PAHs, and VOCs	Carcinogens, developmental, neurological, renal, and reproductive.	50 + acres
Buckstaff – Census Tract 15	Solvents, metals, asbestos, PAHs, and VOCs	Carcinogens, developmental, neurological, renal, and reproductive.	14
Pioneer Island/Hotel – Census Tract 15	Solvents, metals, asbestos, PAHs, VOCs	Carcinogens, developmental, neurological, renal, and reproductive.	18
Marion Road Redevelopment Area - Census Tract 5	Solvents, metals, asbestos, PAHs, VOCs	Carcinogens, developmental, neurological, renal, and reproductive.	10

*WDNR BRRT's site and available environmental reports **ToxFAQs ***City of Oshkosh GIS database

iv) Cumulative Environmental Issues: The neighborhoods surrounding these brownfield sites have residential and mixed uses in close proximity. In addition to the potential environmental risks, residents are exposed to diesel emissions, air and noise pollution from State Highway 45 which runs right through all three Census Tracts and represents an additional source of pollutants. The main line railroad line from New Orleans to Canadian for the Canadian National Railroad runs right through all three Census Tracts. Diesel trains run all hours of the day exposing residential neighborhoods to noise and diesel emissions. An active quarry and concrete batch plant is located just west of these Census Tracts and the predominant westerly winds carry additional air contaminants into the target area. Several closed landfills are located near the three Census Tracts. The City is currently investigating the landfills for environmental impacts and addressing detected methane.

Not only do these cumulative environmental issues affect the public welfare, but also the environment. The migration of contaminants from the Brownfield areas via storm water and/or groundwater is a threat to Lake Winnebago and the Fox River ecosystems. Unfortunately, both Lake Winnebago and Fox River have been listed on the 2011 State of Wisconsin and EPA Impaired Waters database for PAHs, PCBs, Mercury, and total phosphorus impairments. This waterway is part of the Lake Michigan watershed. As noted above, many of these contaminants are found on targeted Brownfield sites. Home to the world's

largest concentration of fresh water sturgeon (2011 WDNR Website), it is important to reduce the risk of impacts from redevelopment of the Oshkosh Brownfields Areas. The Assessment Grant will give the City the funds to continue to delineate the extent of Brownfields contamination, evaluate the contamination, and reduce impacts to human health and the environment.

b.) Impacts on Targeted Community: Direct contact with contaminated surface soils and risks associated with potential vapor intrusion/volatile inhalation from these Brownfields sites is a possibility. Many of the common contaminants on Brownfield sites in Oshkosh are VOCs and PAHs which have been identified as human carcinogens. Elevated lead and arsenic concentrations are also common in the prevalent foundry sand and slag fill. Lead poisoning of children has been reported to cause learning disabilities, neurological defects, mental retardation, and kidney and heart disease. Arsenic exposure can cause cancer and damage to the brain, nervous system, and immune system. Unfortunately many of these Brownfields areas are located in residential areas that are home to sensitive populations, particularly children under 5 years old and senior citizens over the age of 65. According to the 2013 US Census Quick Fact Finder and EPA Enviromapper data, 20.2% of the population in the central city area was below 5 years old or above the age of 60, greater than the Wisconsin average of 19.9% and the US average of 19.8%. These sensitive populations often have a disproportionate rate of lead poisoning, asthma, and chronic illnesses. The assessment grants will help evaluate and perform remedial planning for the three census Tracts.

In addition to industrial facilities, the Target Census Tracts also contain a number of older residential areas. The higher percentage of population in the central city area which is below 5 years old or above the age of 60 is a significant issue because the majority of the homes in these areas are constructed prior to 1950 and may have lead-based paints and asbestos containing materials. www.Scorecard.org, ranked the Oshkosh Redevelopment Areas in the top 80% of counties in the US for the highest number of housing units with a high risk of lead hazards, and the top 90% of homes built before 1950. The National Cancer Institute (NCI) 2015 data indicates a 20.4% annual incidence rate of cancer in ages less than 20 years old for the City of Oshkosh, which is higher than Wisconsin (17.8%), and the Nation (17.4%). The City has used previous EPA Grants to identify, characterize, and raze homes that are abandoned or pose a risk to the public. These new grants will assist with the City's efforts to further characterize neighborhoods and homes to limit exposure of children and older adults to hazardous materials through the assessment of older buildings and the development of new sustainable low to moderate income neighborhoods.

Due to the higher poverty rate in the three Census tracts, the availability of a good nutritious sustainable food source is nonexistent in these areas. In fact, the United States Department of Agriculture (USDA) has designated these three areas as Food Deserts (2011 USDA Food Desert Locator). According to the USDA, a Food Desert has been defined as low-income communities without ready access to healthy and affordable food. According to the County Health Ranking and Roadmap 2013 data, the City of Oshkosh has an adult obesity rate of 29%, greater than the national average of 25%. Local community groups and the City are utilizing Brownfield sites in the central city as urban gardens that will bring fresh foods to the local citizens. However, more available land within the Target Census Tracts is needed. Clearly, brownfield redevelopment projects that bring increased access to healthier food choices can help change this increasing rate.

c.) Financial Need

i) Economic Conditions: As indicated in Section 1 above, Oshkosh has seen a decline in its manufacturing base since the 1960's and more recent with the 2009 "Great Recession". According to a recent article in the December 8, 2015 Oshkosh Northwestern newspaper, the Oshkosh median income dropped 10 percent to \$40,676 since 2009 compared to the national average medium income of \$53,046 a decrease of 7.5% since 2009. The three target Census Tracts had an average medium income of \$38,080. According to 2013 US Census data the annual average unemployment rate for the three target Census Tracts was 8.4%, which is higher than the State of Wisconsin level of 7.8% and National average of 5.3%.

This higher unemployment rate can be attributed to the continued loss of manufacturing businesses or downsizings over the past year. When 24.1% of a community's jobs are related to the manufacturing industry, downsizings and closings have a significant effect on many Oshkosh citizens and families. Because of the continued loss of manufacturing jobs to a community where the job force has

EPA Hazardous and Petroleum Assessment Grant Proposal (Community-Wide)

relied upon manufacturing, the City has seen an increase in poverty. The target Census Tracts now have a poverty rate of 25% (2013 US Census Quick Facts Database) as compared to the National average of 11.3%. While the Nation as a whole has seen a recovery from the 2009 "Great Recession," the City of Oshkosh continues to lag behind due to the loss of manufacturing.

ii) Economic Effects of Brownfields: As detailed above, the community has suffered from a significant loss of jobs, wealth and taxable income. Brownfield sites contribute to this decline. Taxes are not current. The effect is not only the loss of revenue, but a cost to maintain abandoned properties (mowing and brush control, security, illegal dumping cleanup, etc.). Further, these properties are a haven for illicit activities, placing a greater burden on short-staffed public safety departments.

The loss of jobs has impacted the lower earnings as evidenced by the demographic information above. Neighborhoods with lower earnings and greater poverty are less attractive to potential developers as the demographic data might not support private investment. The loss of investment and job creation as new construction moves to more affluent, suburban areas is incalculable. We believe there is a need to incentivize such projects at all levels of their planning and development.

In the past, the City used Community Development Block Grant (CDBG) funds on a very limited basis for assessment activities. However, with continuous Federal cuts, CDBG funds are more beneficial for activities directly benefitting low to moderate income individuals—such as housing rehabilitation projects. The City also continues to feel the effects of reductions in State aids. These reductions put a strain on the City's budget to address environmental issues.

The City does not have the staff expertise to conduct environmental assessment or cleanup activities, and the reductions in State and Federal aids, makes it nearly impossible for the City to budget any Brownfield-related assessment or cleanup funds. The following are estimated costs to complete assessment activities at the priority sites identified. Additional funds are needed to address other sites in designated redevelopment areas and across the community to maintain the momentum generated by previous success stories.

Priority Site	Type of Assessment	Estimated Cost*
Morgan Doors/ Jeld-Wen	Phase I, II, Cleanup Planning	\$45,000 (haz) \$25,000 (petro)
Buckstaff	Phase I, II, Cleanup Planning	\$30,000 (haz) \$20,000 (petro)
Former Pioneer Island/Hotel	Phase I, II, Cleanup Planning	\$40,000 (haz) \$15,000 (petro)
Marion Road Redevelopment Area	Phase I, II, Cleanup Planning	\$150,000 (haz and petro)
South Shore Redevelopment Area	Phase I, II, Cleanup Planning	\$150,000 (haz and petro)

*Subject to change as more information becomes available

2. Project Description and Feasibility of Success

a. Project Description, Project Timing and Site Selection

i) Project Description: Brownfields in the City are predominantly along both sides of the Fox River corridor and in the central city area. The City has a long history of manufacturing and industrial uses on the banks of the Fox River and Brownfields redevelopment is one of several efforts that continue to change the face of the river corridor. For many years the targeted Census Tracts experienced job loss, declining property values, shrinking populations, concentration of poverty, blight, crumbling infrastructure, etc. The central city district increasingly became less of a destination to live, work, and play and more of a place of

residents leaving and businesses closing. The effects of Brownfields on the community include a reduced property tax roll, inefficient use of land, and incompatible/conflicting land uses. Redevelopment of the central part of Oshkosh is moving forward as is evident with the implementation of the Downtown Action Plan and the construction and conversion of several housing units to low-income housing. Old, vacant, and blighted properties are not complementary neighbors for the central city area. Keeping people in the central part of Oshkosh and growing neighborhood communities.

The City's vision for promoting Brownfield redevelopment is reinforced in the 2005 Comprehensive Plan. The Comprehensive Plan includes several goals related to Brownfield redevelopment, including: 1) Continue revitalization efforts of the downtown and central city area; 2) Promote environmentally sensitive and responsible utilization of land, incorporating permanent open space and natural resources; 3) Encourage the efficient and compact utilization of land; 4) Promote the re-use of land and buildings; 5) Encourage redevelopment in the central city to be oriented toward the lakefront and riverfront.

To achieve the Brownfield redevelopment goals established within the City's Comprehensive Plan, the City developed the Downtown Design and Redevelopment Plan with input from the community. Both plans also take into account the role of the Fox River, which is part of the City's rich heritage. The Fox River will be made more accessible to the public through the use of public parks/open space and trail systems. The economic, transportation, public parks/open space needs of the adjacent neighborhoods is also taken into account through the continued partnership between the public and private sector. The Downtown Design and Redevelopment Plan and the Comprehensive Plan have identified five main areas for redevelopment in the Fox River Corridor (Census Tracts #5, #12, and #15). Redevelopment concept plans for the five target areas take into account all of the City's goals described above. Many of the goals outlined in Oshkosh's plans and guidelines follow the 2009 five EPA Livability Principles.

To further focus on the above plans the City is moving forward with the development of a long term investment plan called *The City of Oshkosh Central City Investment Strategy* which includes the target Census Tracts, the central city district, which includes the Fox River and Lake Winnebago waterfront area. This plan will help guide and spur both public and private investment and programming in the downtown and adjacent central city areas for the next ten to fifteen years. Developing *The City of Oshkosh Central City Investment Strategy* is crucial to the long term economic and community development health of the city due to the great concentration of property value, businesses, jobs, worker housing, and density of population in the central city. Receipt of the EPA Assessment Grant is a key component to making this plan happen. Without additional funding to assess the environmental issues, development interest is deterred due to the costs and uncertainties of such conditions.

The current status and proposed grant activities of the priority areas follows:

1. **South Shore Redevelopment Area** - This 50+ acre district lying in the Census Tract #12 and #15 along the south shore of the Fox River, contains over 130 parcels containing a mixture of older obsolete and deteriorated industrial, commercial and residential structures. The construction of industrial, commercial, and residential space. **Assessment Needs: City will continue to assemble properties for redevelopment. Conduct All Appropriate Inquiry (AAI), vapor intrusion investigation, asbestos survey, and remediation planning.**
2. **Former Pioneer Island/Hotel** - This hotel complex is located on Lake Winnebago at the mouth of the Fox River and considered one of the prime properties in the City's Census Tract #12. However, since the Pioneer Hotel went out of business in 2000, the complex has become blighted and a public hazard. Because of its blighted condition, the stigma of a Brownfield site has prevented the redevelopment of this unique property. Once the property is purchased, the remaining structures will be razed. Plans for this property include extending the Fox River Riverwalk along the shores of this property, hotel space, and redevelopment of the marina. **Assessment Needs: All Appropriate Inquiry, vapor intrusion investigation, asbestos survey, and remediation planning.**
3. **Morgan Doors/Jeld-Wen** - The former Morgan Doors/Jeld-Wen manufacturing facility occupies four different parcels and approximately 30 percent of the South Side Redevelopment Area in Census Tract #12. Redevelopment of this facility is significant to the success of the South Shore

Redevelopment Area and riverwalk trail system. Reuse includes low to moderate income housing, commercial, open green space and urban gardens. **Assessment Needs: Conduct All Appropriate Inquiry, remediation planning, cleanup.**

4. **Buckstaff** – Located adjacent to Census Tract #12, Buckstaff Company is one of the oldest manufacturing facilities in Oshkosh that closed in 2010. The site is 80% covered by buildings. Acquisition by the City is a possibility. **Assessment Needs: All Appropriate Inquiry, vapor intrusion investigation, cleanup planning for demolition debris, and remediation planning.**
5. **Marion Road Redevelopment Area** – The Marion Road Redevelopment Area located in Census Tract #5 is ongoing. This area is an integral link between the University of Wisconsin Oshkosh and downtown. Construction of the new Marion Road is complete and serves as a transportation route between the University and downtown. The City completed Phase I and Phase II ESAs on the eight properties and three ABCAs using EPA Assessment Grant funds. Parts of Marion/Pearl Redevelopment Area have been redeveloped using EPA funds. A 51-unit apartment building (Morgan Crossing), elderly housing, a pharmacy, and office building have been completed as part of redevelopment of the area, as well as construction of a pedestrian/bike riverwalk. The City's two EPA Cleanup Grants were used to assist with cleanup for future redevelopment. However, a 6 acre manufacturing complex and three vacant parcels remain to be developed. **Assessment Needs: All Appropriate Inquiry, vapor intrusion investigation, remediation planning and cleanup.**

In addition, to the target sites, we envision four to six additional projects community wide. The types of redevelopment projects typically encountered include repurposing abandoned industrial sites near the downtown area with mixed commercial/residential uses. We would also wish to assist the local community housing development organization, Habitat for Humanity, as well as the Public Housing Authority, in their efforts to remove or rehab blighted properties address affordable housing for the elderly and low and moderate income individuals and homeowners. All Appropriate Inquiry, hazardous material surveys, asbestos survey, and remediation planning help Habitat and the PHA leverage other State and Federal funds to assist with neighborhood stabilization efforts. Habitat and the PHA may have two or three relatively small scale projects each year of this nature. As cleanup and redevelopment plans are prepared, we plan to communicate the viability for development of the property to the affected neighborhood and the community, as well as business leaders and local lenders. Our partnerships with various business and community groups will aid in this effort.

ii) Project Timing: The Department of Community Development has managed Oshkosh's past EPA grants and will manage this grant. The Grants Coordinator will manage the project including evaluation of potential requests for assessments, obtaining site access, procurement of technical service providers, etc. Contractors needed for timely completion of grant activities will be procured through the RFP process and in compliance with 40 CFR 30/31. We envision that upon award, we will immediately begin the contractor procurement process. We would expect the contractor to prepare a Quality Assurance Project Plan within the first 90 days of the grant so that assessment activities are not delayed. Priority sites have already been identified and the City will initiate site access processes immediately after grant award. Initial community involvement will take place in the first three months after grant award. The final work plan schedule will be developed to show completed Phase I assessments in year one leading quickly to a Quality Assurance Project Plan and Phase II activities. The schedule will show completion of ABCAs and related clean-up planning not later than three months before the end of the project period. Quarterly meetings of a core project team and conference calls with the EPA project officer will monitor progress. Based on our pre-planning efforts, we are ready to make full use of the funds during the three-year grant period.

iii) Site Selection: Indicated above, the City has planned and budgeted to move forward with the next phase of redevelopment as part the Downtown Design and Redevelopment Plan and Comprehensive Plan. The City will continue to use its Brownfield inventory that was prepared with 2002 EPA Brownfield Pilot funds to further rank properties. Over time, this inventory has expanded as redevelopment opportunities have arisen in the central city area. Expenditure of assessment funds will be concentrated in (but not

limited to) priority Census Tracts to encourage the redevelopment of areas. Sites that come up as part of the citizen input, developer requests, and identified through planning for the *City of Oshkosh Central City Investment Strategy* will be considered as eligible properties via goals set forth in the 2005 Comprehensive Plan. The City will review and determine site selection based on the US EPA Site Eligibility and Property Ownership Eligibility criteria. Once a property is approved, the City will obtain legal access to properties not owned by the City. The City will first use reasonable good faith efforts to execute a formal voluntary Property Access Agreement with current property owners. Only if the site poses an imminent health threat or under other extenuating circumstances will alternative property access measures be pursued as allowed by local ordinances and Wisconsin State Statutes.

b. Task Description and Budget Table

i) Task Description: The City of Oshkosh is submitting a community-wide petroleum and hazardous assessment with the intention of using the grant funds on multiple sites within the community. Activities in the budget below would only be conducted on sites where the EPA has made a determination of eligibility.

Description of Task Categories

Task 1 – Phase 1 Site Assessments: While the Brownfield inventory funded through the Brownfields Demonstration Pilot Grant served as a base line environmental review for riverfront properties, the City will need to conduct Phase I assessments on the parcels described in Section 2.A., and on a city-wide basis as opportunities for purchase or redevelopment become available outside of the inventory area. 20 Phase I Assessments (10 hazardous substances and 10 petroleum) will be performed in accordance with ASTM E 1527-05 All Appropriate Inquiry at \$4,000 each. Information sources will include the Environmental Database Resource (EDR) reports, City properties in tax foreclosure, and the City's public museum. Costs include specific property Eligibility Determinations which will be performed and submitted to the EPA prior to starting a Phase I ESA. Copies of documents will be forwarded to EPA Region 5 staff. Any updates needed to the City's Brownfield inventory will be performed as part of this Task.

Task 2 – Environmental Site Assessments: This task will also include the contractual costs associated with preparing a Quality Assurance Project Plan (QAPP) for \$5,000. This Task includes completion of Health and Safety Plans, Sampling and Analysis Plans, and 20 Phase II Assessments (10 hazardous substances and 10 petroleum) at \$12,000 per investigation. Draft copies will be forwarded to the WDNR and EPA Region 5 staff for final approval. The City will also use these funds to cover asbestos and lead assessments and possible tank removals. WDNR VPLE and WDNR assistance fees will also be included in this Task. Environmental sampling and assessment will be completed in accordance with approved Quality Assurance Project Plans, Health and Safety Plans, Sampling and Analysis Plans, and Wisconsin regulations.

Task 3 – Remediation Planning: 8 Remedial Action Plans and ABCA's (4 hazardous substances and 4 petroleum) will be developed for properties that require remediation prior to or in concert with redevelopment at \$7,500 each. Along with developing these plans, meetings will be held to review alternatives and strategize on the most effective remedial options while considering redevelopment. Remedial Action Plans and ABCA's will be submitted to the appropriate regulatory agency for review and approval. Funds from the category will also assist with regulatory fees associated with WDNR VPLE cleanup program.

Task 4 – Community Outreach: This task includes activities that will continue to enhance the City's involvement efforts to keep citizens informed and involved with this grant project. Community Relations Plan (CRP) will also be completed under this Task. Community outreach efforts include public informational meetings, printing brochures. Supply costs are for preparing, printing, and mailing project information and marketing information. This task includes costs associated with travel by City staff to Brownfield-related conferences and meetings, monitoring and enforcement of institutional controls(s). Estimated costs are for travel/conferences \$6,000 (\$3,000 for hazardous substances and \$3,000 petroleum). Travel costs assume two persons attending a National Brownfield Conference (two events during the grant period) and two local State-specific brownfield conferences in each fiscal year. Travel costs are based on an assumed flight cost of \$625 per person; car rental (\$40/day for 8 days = \$320); hotel fees of \$150/night (8 nights total during the grant = \$1,200) and incidentals (\$375 total). Fees to attend local events are modest (about \$60 per event x 8 = \$480)

EPA Hazardous and Petroleum Assessment Grant Proposal (Community-Wide)

All estimated costs for technical activities described above are based on our experience and awareness of pricing in the marketplace. Cost may change per specific project sites.

ii) **Budget Tables:****Proposed Budget for Hazardous Substance Assessment Grant**

Budget Categories	Task 1 – Phase I Site Assessment	Task 2 – Environmental Investigations	Task 3 – Remedial Planning	Task 4 – Community Outreach, Programmatic Expenses and Travel	Total
Personnel					
Fringe Benefits					
Travel				\$3,000	\$3,000
Equipment					
Supplies					
Contractual	\$40,000	\$125,000	\$30,000	\$2,000	\$197,000
Total	\$40,000	\$125,000	\$30,000	\$5,000	\$200,000

Proposed Budget for Petroleum Substance Assessment Grant

Budget Categories	Task 1 – Phase I Site Assessment	Task 2 – Environmental Investigations	Task 3 – Remedial Planning	Task 4 – Community Outreach, Programmatic Expenses and Travel	Total
Personnel					
Fringe Benefits					
Travel				\$3,000	\$3,000
Equipment					
Supplies					
Contractual	\$40,000	\$125,000	\$30,000	\$2,000	\$197,000
Total	\$40,000	\$125,000	\$30,000	\$5,000	\$200,000

The City plans to track and measure their success relative to the grant in general accordance with EPA Order 5700.7 and EPA 2003 Strategic Plan. The City will look at their progress by the completion of certain project outputs and outcomes for certain sites. The City will track the success of the outputs and outcomes through quarterly reports, which will be submitted to the EPA. The City will also update the public with successful outputs and outcomes on the City's website and via the CRP.

C) Ability to Leverage: The City has committed general revenue funds for in-kind services with Economic Development Division staff administering Brownfields grants. In the past the City has used federal, state, and private funds for cleanup activities and will continue to pursue these grants as projects

are proposed and as grant funds become available. The City received two Wisconsin Economic Development Corporation (WEDC) Brownfield Cleanup Grants for a total of \$547,000 and a WEDC Site Assessment Grant for \$149,800. The City was also awarded a \$953,000 Wisconsin Department of Natural Resources grant for riverwalk improvements on a portion of the Morgan Doors/JeldWen property. The City also just completed work on another section of riverwalk improvements that included a \$944,000 Wisconsin Department of Natural Resources grant. The City is also the recipient of a \$2,000,000 grant from the US Department of Commerce, Economic Development Administration, for installation of utilities and site preparation for development of an Aviation Business Park.

If additional environmental services are required beyond grant funds, and where Tax Increment Financing funds can be employed, the City will evaluate and pursue such options to fill any funding gaps. Several Tax Incremental Districts exist within the City, seven of which are downtown in the targeted area where Brownfield funds have been concentrated.

3 Community Engagement and Partnerships

a. Plan for Involving Targeted Community and Other Stakeholders; and Communicating Project Progress

i) Community Involvement Plan: The City understands it will be critical to have open and ongoing communications to effectively implement this project. There are no established neighborhood associations in the Priority Site areas offering an existing communication network. So it will be necessary to coordinate these efforts on our own. We envision public meetings at key stages in the project to inform the public of redevelopment activities. Through targeted direct mailings and public meetings, we will provide information on projects, and provide opportunities for input/questions. Also, a web page has been created summarizing the City's previous brownfields grant proposals and awards. This grant application will also be posted on the City's web page and social media outlets to inform the community of the pending grants. For collaborative projects, we will work with that organizations established network or an established neighborhood association to disseminate information on the project.

Most redevelopment projects will require review and approval by the City Plan Commission, Common Council and possibly the Redevelopment Authority. These are open meetings at which interested parties can voice their comments about a proposed project. Affected property owners are notified of a pending project coming before the Plan Commission, when and where the meeting will be held to discuss the proposal and obtain public input. Information is also available on the City's web page for each of these Committee's that provides technical information about the request, staff contact information, and supporting documents. These meetings are open to the public and televised. The City of Oshkosh will maintain the administrative record file to reflect the status of the project, public comments, response to public comments, and other significant decisions regarding environmental remediation.

ii) Communicating Progress: The City will continue to update the webpage designed specifically for the City's EPA grant awards and any future grant awards. Major accomplishments will be conveyed through press releases to the local newspaper, *The Northwestern*; local radio stations WOSH, KFIZ and WNAM, and the City's public access television station. Hmong and Spanish speaking radio stations will also be contacted to update nonspeaking English residences. Throughout the grant, the City will track metrics related to environmental expenditures, assessment activities, cleanup activities, etc. that are uploaded into USEPA's ACRES database and in Quarterly Reports. These are also publicly available. Through the public's access to these data, there are ample opportunities to share progress and program successes.

The City will take a varied approach to enable citizens to comment in oral, written, and electronic formats. Based on the size and structure of the community, we believe these methods are the most effective means to have meaningful engagement with its citizens and will help connect residents affected by the brownfield sites to the opportunities arising from redevelopment. American Community Survey data

shows that English is spoken in most households including minority populations, and there are no significant language barriers. However, to reach minority populations, the City will provide materials in Hmong and Spanish and work with the local University as needed for translator services or Region 5 EPA staff.

b. Partnerships with Government Agencies

i) Local/State/Tribal Environmental Authority: The City will continue to coordinate its redevelopment efforts with state, regional, and local WDNR offices. The City has worked, and will continue to work, with local environmental authorities throughout their redevelopment process. On the local level, Mr. Kevin McKnight (WDNR) has been integral in focusing our Phase I and Phase II assessments to meet the needs of developers while keeping the state's cleanup regulations a priority to protect human health and the environment. Mr. McKnight and the WDNR will be part of the review and approval process for any remedial action plans and institutional and engineering controls. We will close sites using many different state mechanisms including their flexible closure regulations and Voluntary Party Liability Exemption (VPLE) program. The VPLE program basically gives the City exemption from future liability for any past contamination on the site once the site reaches a certain cleanup criteria. The State assumes the liability for any past contamination after the impacts on site have been assessed and remediated to the satisfaction of the WDNR. The liability exemption can be passed on to future property owners or developers, which is a very attractive marketing tool for redevelopment. The City is currently pursuing a VPLE Certificate of Closure (COC) on two parcels within the Marion Road Redevelopment Area and has already received a VPLE COC on two parcels within the Marion Road Redevelopment Area. The city is also looking at VPLE process for several parcels located in the South Shore Redevelopment Area.

The City works very closely with the Winnebago County Health Department to improve health disparities in its low-income neighborhoods. The City and County utilize an XRF Meter to analyze homes of low-income neighbors for paint with elevated lead. Teaming with the local Health Department will bring additional technical expertise to Brownfield Assessments.

Where appropriate, the City will also coordinate projects with the East Central Wisconsin Regional Planning Commission (ECWRPC). The Commission is the official comprehensive planning agency for the East Central Wisconsin counties of Calumet, Fond du Lac, Green Lake, Marquette, Menominee, Outagamie, Shawano, Waupaca, Waushara, and Winnebago. The ECWRPC has provided assistance with developing the city's transportation and comprehensive plans.

ii) Other Governmental Partnerships. At the State level, Ms. Naletta Burr and Mr. Jason Scott from the Wisconsin Economic Development Corporation (WEDC) have been integral in overseeing and answering questions related to properties where WEDC redevelopment grants and the state petroleum cleanup funds have been used to investigate, remediate, and develop contaminated sites. Local and state representatives ensure that public health issues are considered on each site for each contaminant of concern while allowing for a degree of creativity and innovation in handling environmental issues to allow for redevelopment. The City has open communication with all of these regulatory authorities in the form of phone calls, meetings, project updates, required reports, and presentations.

c. Partnerships with Community Organizations

i) Community Organizations Description and Role: Representatives of public and private organizations were contacted regarding the development of this proposal and play a significant part in the redevelopment of Oshkosh. The following organizations will play an important role in the implementation of the EPA Assessment Grant.

University of Wisconsin-Oshkosh (UWO): The UW system owns over 150 acres in the central city with a portion of the property along the river in close proximity to the city's redevelopment areas. The University believes that these redevelopment projects are vitally important to the future of the city and the University and they fully support the grant proposals. The City has utilized interns from the University to assist with data collection on various projects. The City is also partnering with the University on a new Aerolnnovate program.

Oshkosh Area Community Foundation: The Oshkosh Area Community Foundation (OACF) is a public charity serving Winnebago, Green Lake, and Waushara Counties. The Foundation is dedicated to improving the lives of all citizens. It will support the brownfield program by helping promote the success of the program.

EPA Hazardous and Petroleum Assessment Grant Proposal (Community-Wide)

Oshkosh/Winnebago County Housing Authority: The public Housing Authority supports Oshkosh's role in assessing and cleanup of brownfields sites to provide affordable, decent housing for elderly and low to moderate income persons.

The Morgan Partners: The Morgan Partners own the former Morgan Doors/JeldWen property that is one of the Priority Sites included in the grant application. They understand the importance of the City being able to provide both financial and regulatory assistance on brownfield sites. They support the City's efforts in the assessment and cleanup of brownfields sites.

Greater Oshkosh Economic Development Corporation (GO-EDC): GO-EDC is a non-profit, public-private partnership created to promote economic growth in the greater Oshkosh region. GO-EDC will be a community stakeholder and assist the City in identifying potentially contaminated sites and promote the City's efforts in assessing and cleanup of brownfield sites.

ii) **Letters of Commitment:** Letters of Commitment from the Community Organizations are attached.

4. **Project Benefits**

a. **Health and/or Welfare and Environmental Benefits**

i) **Health and/or Welfare Benefits:** EPA funds will be used to complete site assessments, evaluate exposure routes for contaminants of concern, and prepare remedial action plans for development of the sites. The areas of concern will be assessed via Phase I and Phase II ESAs to determine the degree and extent of impacts and their possible threat to human health and the environment. Access to the site will be prohibited during the assessment activities per the Health and Safety Plan (HASP). The SAP and HASP will also outline protocols to protect workers and the public during the assessment activities. Phase II investigation waste will be containerized on-site, placarded as hazardous material, and appropriately disposed. Once identified, a remedial action plan can be developed to meet the needs of the development while addressing the contaminants of concern, and eliminating the threat of exposure due to direct contact, ingestion, inhalation, or impact to groundwater and surface water. In the past, we have used a combination of remedial measures including excavation and off-site disposal, capping impacted fill soil on site, performing risk assessments, performing statistical evaluations to demonstrate background conditions, and where "hot spots" exist, using Wisconsin's VPLE program and evaluation of more innovative remedial measures to protect human health and the environment.

ii) **Environmental Benefits:** One of the main concerns in the Redevelopment Areas is the elevated metals, VOCs, and PAHs that have been detected in soil and/or groundwater. These concentrations are generally a result of historical manufacturing, foundries, and lumberyard operation along the Fox River for the past 100 years. Many times it is both economical and feasible to determine the extent of impacts and leave these impacts on site using institutional engineering controls that are integrated with the development of the site. In such cases, institutional engineering controls would prevent the groundwater impacts from migrating further and providing barriers (parking lots, buildings, or berms) that will prevent direct contact. Sites with contaminants left in-place will require that institutional controls be placed on the property. Institutional controls can be in the form of a deed restriction, maintenance of engineering controls, and placement on the state's GIS database for contaminated sites. Through the redevelopment process at these and other sites, we expect to see environmental improvements to stormwater controls, elimination of the runoff of contaminated sediments, and placement of engineered barriers to prevent exposures to vapors and surface contaminated soils.

b. **Environmental Benefits from Infrastructure Reuse/Sustainable Reuse:**

i) **Policies, Planning, and Other Tools:** The City's 2005 Comprehensive Plan incorporates "Smart Growth" policies that look within their existing boundaries and utilize land that is already served by city services for development opportunities as opposed to continuing to annex Greenfield sites for growth on the periphery of the municipality. Redevelopment projects, such as the Marion Road Redevelopment Area and the South Shore Redevelopment Area, are consistent with Smart Growth principles. In the 2005 Comprehensive Plan, the goal "Promote the re-use of land and buildings" was included to develop programs and incentives that decrease consumption of new land and new materials. For example, on demolition projects, the City incorporates mandatory recycling of in order to reduce the amount of material going to the landfill (and paying for tipping fees).

However, not all buildings are being razed. A majority of the buildings in the Oshkosh Brownfield area were constructed over a hundred years ago and are considered of historic value. Buildings that are historic and structurally sound will be saved and revitalized.

On September 11, 2007, the Oshkosh Common Council approved the U.S. Mayors Climate Protection Agreement. The City is committed to moving forward with green building and improving energy efficiency building standards with its developments. Future redevelopment projects will need to include some components or a LEED certification. The buildings will look at incorporating green building features such as a south side facing atrium that will take advantage of direct sunlight for heating and light.

Developments will also look at creating landscaped buffers along the Fox River to reduce stormwater sheet flow into the Fox River. Assessment grant Remedial Plans can also incorporate engineering controls that limit stormwater runoff from contacting impacted soils and assist with the design stormwater treatment controls (bio-swales). In addition, parking lots and decorative landscaping berms will be used to provide barriers to the fill soils. In this way, the impacted fill soils will be beneficially reused on site. Building design will also incorporate foundation design that will be used as a cap over the impacted fill soils, which will limit the amount of soils going to a landfill.

The City in conjunction with EPA Region 5 staff completed the first ABCA in the nation that provides a green cleanup review of remedial options. The City voluntarily incorporated the six core elements of green remediation established by the US EPA in our ABCA, showing our commitment to sustainable reuse

ii) Intergrading Equitable Development or Livability Principles: The Partnership for Sustainable Communities (PSC) established by HUD, DOT, and EPA was conceived to advance development patterns and infrastructure investment programs that achieve improved economic prosperity, and healthy, environmentally sustainable, and opportunity-rich communities for all Americans. The Livability Principles include: 1. provide more transportation choices; 2. promote equitable affordable housing; 3. increase economic competitiveness; 4. support existing communities; 5. leverage federal investment; and 6. value communities and neighborhoods. These Livability Principles will be taken into consideration when developing area wide plans, and site reuse plans. Community engagement opportunities will be sure to include these as guiding principles in decision making.

c. Economic and Community Benefits

i) Economic or Other Benefits: The residential conversions and the Riverwalk plan meets the goals of the City's Comprehensive Plan and the basic tenets of new urbanism. Also, for developers interested in new urbanism-type projects, the City added "Article XIX Traditional Neighborhood Development" chapter to the Zoning Code in December 2001. In this new urbanism chapter, provisions are made for smaller infill projects, for mixed uses and mixed housing styles, and aesthetic enhancements to provide a neighborhood atmosphere and improve a quality of life for the existing resident. Using grant funds for assessment activities will help lessen the burden on the City's general revenue fund, so that general revenue funds can be shifted to non-environmental activities to achieve these goals. With the City playing a role in the redevelopment process, whether as a land owner or as a partner in the process, the City can help accumulate small, undesirable parcels into larger parcels that look more attractive to redevelopers. This will lighten the risk a developer takes by doing some of the environmental assessment and cleanup work to make the site comparable to what a Greenfield site would offer. With the City being a partner in this process, this makes land abandonment less likely to occur and, therefore, prevents future Brownfields. The city is moving forward with this concept within several areas of Census Tract #5, #12, and #15. This redevelopment of the Brownfields areas promotes non-industrial mixed use reuse of the properties. Increased decent, affordable housing is necessary to increase the tax base, attract additional services and sustain local small businesses and provide jobs for the local residences.

EPA Hazardous and Petroleum Assessment Grant Proposal (Community-Wide)

Based on other projects that the City has managed in the past, we anticipate the following outcomes at the priority sites:

Priority Area/Site	Potential Investment	Potential Job Creation	New Tax Revenues Generated
Morgan Doors/ Jeld-Wen	\$40,000,000 in new construction	100+ new jobs	\$500,000 / year
Buckstaff	\$1,000,000 in new construction	5-10	\$25,000 / year
Pioneer Island/ Hotel	\$10,000,000 in new construction	30-50	\$125,000 / year
Marion Road Redevelopment Area	\$12,000,000 in new construction	30-50	\$150,000 / year
South Shore Redevelopment Area	\$10,000,000 in new construction	10-30	\$125,000 / year

In 2006, the City adopted the "Fox River Corridor Riverwalk Plan and Design Guidelines" that is consistent with the City's goal of creating an accessible riverfront trail along the Fox River. The trail system is over 3.5 miles in length and will provide a paved path through the heart of the downtown area on both sides of the river. The trail system will be accessible to pedestrians, boaters, fishermen, and other recreational users bringing people to the central parts of Oshkosh. Developing and sustaining new business opportunities for the central portions of Oshkosh. EPA Assessment funds will be an important part of the assessment of brownfield properties that may be acquired and remedial planning of the Riverwalk Trail system.

Providing sufficient park and outdoor recreation facilities and open space is an integral part of each redevelopment plan along the Fox River. Many of the parks and recreational opportunities located in the redevelopment areas are either deficient in recreational facilities or separated from the neighborhoods that will utilize them. Unfortunately, some of these sites are environmentally impaired. Environmental data collected from the City's EPA Brownfields Assessment Pilot Grant has indicated some levels of contaminants are above State of Wisconsin direct contact levels. The City will utilize funds from the EPA Site Assessment Grants to further define the extent of contamination and assist with remediation planning.

ii) **Job Creation Potential: Partnerships with Workforce Development Programs:** All project developers funded by the Assessment Grant will be given information about organizations providing support for worker training and workforce development. We will rely upon these organizations to assist residents in the target community with skill development and job placement. The organizations include the Oshkosh Area Workforce Development Center and University of Wisconsin Oshkosh Wisconsin Family Business forum. Through these existing efforts we hope to connect residents in the affected community with the economic opportunities created through Brownfield redevelopment.

5. Programmatic Capability and Past Performance

a) **Programmatic Capability:** The grant will be managed by the City, namely the Department of Community Development. The department will use procedures currently in place for the City's existing grant funds. The Project Manager will be Mr. Allen Davis, Community Development Director, and the Assistant Project Manager will be Ms. Darlene Brandt. Both Mr. Davis and Ms. Brandt have managed EPA Grants in the past, and Ms. Brandt attended EPA grant trainings including the 2009 Chicago training and ACRES training. Ms. Brandt also administers a variety of grants awarded to the City, including the City's Federal community development block grant entitlement funds, US Department of Commerce Economic Development Administration grant, Wisconsin Economic Development Corp. site assessment and cleanup grants to name a few. Ms. Trena Larson is the Director of Finance and is responsible for comprehensive financial administration and planning for the City.

EPA Hazardous and Petroleum Assessment Grant Proposal (Community-Wide)

The City does not have the staff expertise to conduct environmental assessment or cleanup activities. The City will request proposals from qualified consultants and contractors to perform these tasks.

b) **Audit Findings:** The City has not had any adverse audit findings

c) **Past Performance and Accomplishments**

i) **Currently or Has Ever Received an EPA Brownfields Grant**

The City has a history of successfully managing several state and federal grants. Past Cooperative Agreements between the City and the EPA are noted below.

1. Compliance with Grant Requirements

The City is current with their quarterly reports, their payment requests, and financial reports. The City has consistently met the requirements for QAPP development, eligibility determinations, Sampling Plans, HASPS, Quarterly Reports, Property Profiles, Financial Status Reports, Community Notifications and close-out documentations.

2. Accomplishments

The City has a history of successfully managing several state and federal grants. Past Cooperative Agreements between the City and the EPA include the following:

EPA Agreement	Cooperative	Year of Award	Accomplishments
BP-975386-01 (Pilot)		2000	Developed a Geographic Information System database with information on over 200 properties in the central city and riverfront areas. Performed nine Phase I and Phase II assessments
BF-96520101 (Assessment)		2003	The assessment of 25 properties; developed 5 RAPs/ABCAs.
BF-96553901 (Cleanup)		2004	Cleanup of a former MGP site into a park. Leveraged \$812,000 and created 6 jobs.
BF-00E04601 (Cleanup)		2006	Cleanup for development of a commercial center. Leveraged \$4,412,000 and created 16 jobs
BF-00E67201 (Assessment)		2007	The assessment of 45 properties; developed 5 RAPs/ABCAs.

The EPA Assessment funds and Cleanup Grants were used to assist with the cleanup and redevelopment of a total of 46 acres, as well as help install approximately 700 feet of stormwater bio-swales to treat stormwater before entering into the Fox River. The EPA grant successes have been uploaded into the ACRES database.

SECTION IIIC – THRESHOLD CRITERIA FOR ASSESSMENT GRANT
CITY OF OSHKOSH APPLICATION FOR EPA COMMUNITY-WIDE BROWNFIELDS ASSESSMENT GRANTS:
HAZARDOUS SUBSTANCES AND PETROLEUM – December 18, 2015

1. Applicant Eligibility

For this funding, the City of Oshkosh is classified as a "General Purpose Unit of Local Government".

2. Letters from the State or Tribal Authority

The letter of support and acknowledgement from the Wisconsin Department of Natural Resources (dated December 10, 2015) is attached to this application as Attachment B.

3. An involved community is essential to a successful Brownfields project. The City of Oshkosh will perform the following to involve and inform the community and other stake holders during the planning, implementation and assessment activities:

- A web page has been created summarizing the City's current and previous brownfields grant proposals including this current grant proposal. Website visitors are given the opportunity to submit comments electronically about the grants and also give the name, phone number, and address of the project contact to submit any oral or written comments. The website address is: http://www.ci.oshkosh.wi.us/Community_Development/Brownfield/Brownfield_plan.htm.
- If successfully awarded, the City will publish an ad in the "Oshkosh Northwestern" informing the public of the award and provide a 30-day comment period prior to executing the contract documents and work plan with the EPA. Readers would be informed of the grant proposal, the website address, contact information, and details regarding the public comment period. The grant proposal will be made available online and at the library in order to provide opportunities to review the proposal at a time other than regular business hours.
- The Redevelopment Authority (RDA) of the City of Oshkosh was created to address blight elimination, slum clearance, and urban renewal type programming for general redevelopment activities. Progress of the City's grant projects will be reported at RDA meetings. This meeting are open to the public and advanced noticed of the meeting's agenda is available to the public. Developers, citizens, consultants, and City staff have been and will continue to be involved in redevelopment planning at different phases of the planning, implementation, and assessment process.

Additional meetings will be held at the close of the grant period to review accomplishments and receive public input on grant performance improvements (if needed). CRPs and draft ABCAs will be available for public review per the 30 day required time period on the above mentioned forums discussion and comments. A Decision Document reviewing public comments will be released and the draft ABCA will be finalized following receipt of public comments.

- As noted above, the City will take a varied approach to enable the opportunity for citizens and stack holders to comment in oral, written, and electronic formats. Staff will also provide information at stakeholder meetings to inform the general public and business community about outputs and outcomes of the grant.

Based on the size and structure of the community, we believe the above described methods are the most effective means of meaningful engagement with the community. We believe the methods provide two-way communications so the public is informed of the program's efforts and the project team is aware of the communities' needs and desires. We believe these methods will help connect residents affected by the brownfield sites to the opportunities that come about from brownfield redevelopment.

More detailed discussion of community and stakeholder involvement can be found in the Narrative Proposal Section V.B.3.

• Site Eligibility and Property Ownership Eligibility

Not applicable. The City is applying for community-wide hazardous and petroleum assessment grant.



December 10, 2015

Mr. Allen Davis
Community Development Director
City of Oshkosh
215 Church Avenue
Oshkosh, WI 54901

**Subject: State Acknowledgement Letter for the City of Oshkosh for a combined \$200,000
Hazardous Materials and \$200,000 Petroleum Assessment Grant**

Dear Mr. Davis:

The Wisconsin Department of Natural Resources (DNR) acknowledges and supports the application of the City of Oshkosh for U.S. Environmental Protection Agency Brownfield Grant funds identified above.

The Wisconsin DNR is fully committed to a collaborative partnership with the City of Oshkosh, and will support your brownfield assessment and remediation efforts in many ways, including:

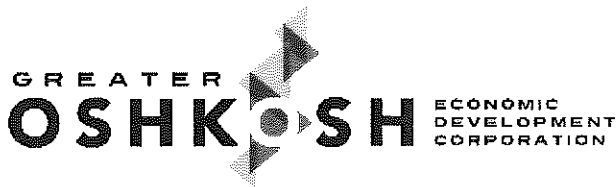
- The Wisconsin DNR can identify key state and federal contacts for your specific project and coordinate Green Team meetings with these individuals, in your community, to answer questions and discuss local plans, options and best practices.
- The Wisconsin DNR can assist you in identifying and obtaining additional financial assistance from state-managed grant and loan programs.

Obtaining EPA funding for this grant application is consistent with community needs, vital to the local economy and will help bring needed improvements to the quality of life for residents. Federal funding will also help initiate cleanup activities, create jobs and leverage local investments in brownfield redevelopment.

Sincerely,

Darci Foss, Director
Bureau for Remediation and Redevelopment
Wisconsin Department of Natural Resources

Copy: Tauren Beggs – DNR NER



December 16, 2015

Ms. Darlene Brandt
City of Oshkosh
215 Church Ave
Oshkosh, WI 54901

Re: Letter of Support

Dear Ms. Brandt:

As the CEO of the Greater Oshkosh Economic Development Corporation, I offer my support for the City of Oshkosh's application to the Environmental Protection Agency (EPA) for Brownfield Redevelopment Funding. I am also willing to participate as a community stakeholder in the program and help in any way possible.

The Greater Oshkosh Economic Development Corporation is a non-profit, public-private partnership that exists to promote economic growth in the greater Oshkosh region. Our organization also has a complementary 501(c)(3) foundation that focuses on creating economic opportunities and removing 'slum and blight' within areas of economic distress, which largely exists in the areas targeted by the Brownfield Grant application.

The City of Oshkosh has been very clear about its community-wide priorities, with redevelopment of the City's inner core and along the riverfront being among them. The City has also effectively engaged community partners and citizens in the planning process. The City's economic future is largely dependent upon the community's success of removing blighted properties and restoring them to a more prosperous and widely accepted use by the community.

In sum, I strongly urge the Environmental Protection Agency to grant this funding request. Please do not hesitate to contact me anytime at (920) 230-3322 or jason.white@greateroshkosh.com if I can assist in any way.

My Best,

A handwritten signature in black ink that reads "Jason E. White". The signature is written in a cursive, flowing style.

Jason E. White, CEO
Greater Oshkosh Economic Development Corporation



December 15, 2015

Mr. Allen Davis
Director of Community Development
City of Oshkosh
215 Church Avenue
Oshkosh, Wisconsin 54901

RE: Letter of Support, City of Oshkosh EPA Brownfields Grants

Dear Mr. Davis:

This letter is intended to serve as a recommendation and a statement of support for the City of Oshkosh's applications for an EPA Community-Wide Assessment grant to be used to provide environmental site assessments (Phase I and Phase II assessments) on sites throughout the City, and a Revolving Loan Fund grant that can be used on various brownfields sites.

The University of Wisconsin-Oshkosh has worked actively with the City over the years in numerous initiatives and we are very interested in partnering on environmental issues. The University is currently working with the City and Winnebago County on an Aviation Business Park in which the University would provide faculty and staff resources for management and oversight of an Accelerator Program designed to foster growth of start up businesses by providing funding and intensive mentoring in addition to physical space. The City of Oshkosh would provide the land and infrastructure for the business park. As these incubator businesses prosper and expand, an EPA community wide assessment grant would be beneficial in assisting with potential Phase I and Phase II environmental site assessments. An EPA Revolving Loan Fund grant could also assist these new businesses with gap financing for environmental on brownfields sites.

We believe the possibility of partnering with the City on environmental assessments would provide an excellent opportunity for UW-O staff and students to learn from and contribute to the community.

The UW-Oshkosh campus community fully stands behind the City of Oshkosh in pursuing environmental health and we fully support the city's efforts in assessing brownfields sites throughout the community.

Sincerely,

Thomas G. Sonnleitner
Vice Chancellor for Administrative Services
University of Wisconsin Oshkosh



Oshkosh Housing Authority
Winnebago County Housing Authority

P.O. Box 397, Oshkosh, Wisconsin 54903-0397
(920) 424-1450 • Fax (920) 424-1474 • TDD (920) 424-1479
ohawcha.org



December 16, 2015

Mr. Allen Davis
Community Development Director
City of Oshkosh
215 Church Avenue
Oshkosh, Wisconsin 54901

RE: EPA Community Wide Assessment and Revolving Loan Fund Grants


Dear Mr. Davis:

The Oshkosh/Winnebago County Housing Authority supports the City of Oshkosh's applications for an EPA Brownfields Community Wide Assessment grant and a Revolving Loan Fund grant. The Housing Authority currently is working with the City on several potential redevelopment projects that the Authority would like to undertake. One property in particular is an abandoned industrial site on the northeast side of the City that the Authority would like to rehab and renovate for elderly housing and office space. The property is an eye sore, a safety hazard, crime attractor and degrading the quality of the residential neighborhood. Its improvement will remove a barrier to improving the lives of Oshkosh's low income residents.

The Oshkosh/Winnebago County Housing Authority and City of Oshkosh maintain a strong partnership. The Authority and the City are collaborating with the local Habitat office on the construction of twindominiums for disabled low and moderate income homeowners. The Housing Authority is also utilizing a State HOME grant to purchase vacant properties, rehab them and sell to low and moderate income first time homebuyers in order to revitalize older housing sites in distressed neighborhoods.

As the Authority looks for additional sites for new development or rehabilitation, it will consider brownfield properties and partner with the City to assess its brownfields inventory and identify brownfield sites as potential housing or mixed use developments. We see there is a market for redevelopment with the right incentives and know redevelopment of these sites will create a better quality of life for Oshkosh citizens. We will also commit to utilizing our development contacts to educate and promote use of brownfield properties.

Sincerely,


Susan van Houwelingen
Executive Director



OSHKOSH AREA
COMMUNITY
FOUNDATION

December 15, 2015

Mr. Allen Davis
Community Development Director
City of Oshkosh
215 Church Avenue
Oshkosh, Wisconsin 54901

RE: 2016 EPA Brownfield Assessment and Revolving Loan Fund Grants

Dear Mr. Davis:

The Oshkosh Area Community Foundation is pleased to support the City of Oshkosh in applying for a 2016 EPA Brownfield \$400,000 Community-Wide Assessment Grant and a \$1,000,000 Revolving Loan Fund Grant.

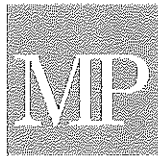
The Foundation supports opportunities that address the once thriving industrial areas in an effort to sustain economic development, address environmental issues, and ensure that brownfields are cleaned up and reused. We see this happening in ways that contribute to healthier buildings and neighborhoods, mitigate environmental conditions through remediation, improve access by residents to greenspace, recreational property, transit, schools, and healthy and affordable food. We also see improvement in employment and affordable housing and opportunities for local residents, as well as reduction in toxicity, illegal dumping and blighted vacant properties.

The Foundation could possibly assist the City in involving the affected community in assessment of cleanup decisions. We would also be a resource in communicating successes to the Oshkosh community as they happen. We are pleased to support actions that lead our community toward growth and stability.

If you have any questions about our support, please do not hesitate to call. I wish you every success and look forward to hearing more about the project when it is funded.

Sincerely,

Burk Tower
Interim President & CEO



THE MORGAN PARTNERS
Professional Real Estate Services

Mr. Allen Davis
Director, Dept. of Community Development
City of Oshkosh
215 Church Ave.
Oshkosh, WI 54901

To Whom It May Concern:

Please allow this letter to serve as an expression of support from our company, The Morgan Partners, LLC, regarding applications being submitted by the City of Oshkosh for Environmental Protection Agency brownfield grants. As the owner of a 27-acre former industrial site located along the Fox River in downtown Oshkosh, we understand firsthand the financial challenges associated with the redevelopment of these challenging sites. The research, investigation and remediation of environmentally impacted sites can deter even the most sophisticated and well capitalized developers from undertaking projects that can be highly beneficial to cities.

It is our understanding that the City of Oshkosh is applying for a Community-Wide Hazardous and Petroleum Substance Assessment Grant as well as a Revolving Loan Fund Grant. It is of utmost importance that municipalities provide assistance of both financial and regulatory nature to ensure that challenging sites can be reclaimed for modern, functional uses. The above grants will ensure that the City of Oshkosh can assist interested parties in investigating and remediating properties in preparation for redevelopment. We are hopeful that these grants will enable more projects similar to ours to proceed and strongly support their award.

Respectfully,

Ed Bowen
The Morgan Partners, LLC

Application for Federal Assistance SF-424*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):***** Other (Specify):***** 3. Date Received:**

Completed by Grants.gov upon submission.

4. Applicant Identifier:**5a. Federal Entity Identifier:****5b. Federal Award Identifier:****State Use Only:****6. Date Received by State:****7. State Application Identifier:****8. APPLICANT INFORMATION:***** a. Legal Name:**

City of Oshkosh

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

39-6005563

*** c. Organizational DUNS:**

0480298390000

d. Address:*** Street1:**

215 Church Avenue

Street2:*** City:**

Oshkosh

County/Parish:*** State:**

WI: Wisconsin

Province:*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

54901-4747

e. Organizational Unit:**Department Name:**

Community Development

Division Name:**f. Name and contact information of person to be contacted on matters involving this application:****Prefix:***** First Name:**

Darlene

Middle Name:*** Last Name:**

Brandt

Suffix:**Title:**

Grants Coordinator

Organizational Affiliation:*** Telephone Number:**

920-236-5029

Fax Number:*** Email:**

dbrandt@ci.oshkosh.wi.us

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OSWER-OBLR-15-04

* Title:

FY16 Guidelines for Brownfields Assessment Grants

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

\$400,000 Community-wide assessment grant application; \$200,000 hazardous/\$200,000 petroleum

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

6

* b. Program/Project

6

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

09/01/2016

* b. End Date:

09/01/2019

18. Estimated Funding (\$):

* a. Federal	400,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	400,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐

a. This application was made available to the State under the Executive Order 12372 Process for review on

☐

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐

Yes

☒

No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Mark

Middle Name:

* Last Name:

Rohloff

Suffix:

* Title:

City Manager

* Telephone Number:

920-236-5002

Fax Number:

* Email:

mrohloff@ci.oshkosh.wi.us

* Signature of Authorized Representative:

Completed by Grants.gov upon submission.

* Date Signed:

Completed by Grants.gov upon submission.